

## 4. Methodology

### The Cairngorms National Park Authority's approach to SEA

- 4.1** The Park Authority's approach to carrying out the SEA is based on the Scottish Executive guidance<sup>3</sup> and the desire to integrate the SEA process closely with the development of the Draft Core Paths Plan itself. The aims and objectives of the Park include explicit reference to a wide range of environmental topics. The procedure which is formalised through SEA is therefore central to the process of developing the Draft Core Paths Plan.
- 4.2** The Park Authority chose to carry out SEA of the Draft Core Paths Plan internally rather than employ consultants to carry out the work as a contract. Previous experience of SEA with the Cairngorms National Park Plan, Local Plan and Outdoor Access Strategy has shown that by doing the SEA 'in-house', it could be better integrated with the development of the Core Paths Plan and would therefore lead to an improved Plan.
- 4.3** The SEA process reflects the development of the Draft Core Paths Plan itself and can be divided into a number of different but overlapping stages. These stages are shown in Figure 4.1 below. Each of these stages is then considered in more detail.

**Figure 4.1 - The SEA Process**

- i. Screening whether Plan is likely to have significant environmental effects;
- ii. Collating and forecasting baseline information;
- iii. Scoping the likely significant environmental effects;
- iv. Developing environmental objectives and criteria;
- v. Assessing the Plan and alternatives;
- vi. Publishing the Environmental Report with the Draft Core Paths Plan;
- vii. Modifying Core Paths Plan and revising Environmental Report;
- viii. Finalising and monitoring proposals;
- ix. Post-adoption Statement of: how environmental considerations have been integrated in the Plan; and how the Environmental Report, consultation responses and public opinions have been taken into account;
- x. Monitoring significant environmental effects of Plan and consider need for review.

<sup>3</sup> Strategic Environmental Assessment Tool Kit (Scottish Executive, 2006).

## SEA screening

- 4.4** An initial screening consultation was issued to the consultation authorities, Scottish Natural Heritage (SNH) and Historic Scotland both judged that the Draft Core Paths Plan could have significant environmental effects. The Scottish Environmental Protection Agency (SEPA) considered that in respect of its main areas of interest – air, water, soil, human health and climatic factors – the Plan is unlikely to have significant environmental effects. The Cairngorms National Park Authority determined that the Draft Core Paths Plan should be subject to SEA on 21 June 2006.

## Environmental baseline

- 4.5** The collation of information to form the environmental baseline for the SEA was aided by the production of the State of the Park Report<sup>4</sup>, part of the process of preparing the Cairngorms National Park Plan. The report draws together existing information on the Park's resources and special qualities as a baseline to inform development and assessment of the Park Plan and future plans and policies in the Cairngorms National Park area. The State of the Park Report comprises four sections:
- Natural resources;
  - Cultural resources;
  - Visitor resources;
  - Economic and social resources.
- 4.6** In each section the report identifies as far as possible:
- Current extent of the resource;
  - Relative importance of the resource;
  - Current state of the resource;
  - Key trends affecting the resource;
  - Limitations on existing data and information gaps.
- 4.7** The report provided much of the environmental baseline data against which the potential effects of the Draft Core Paths Plan can be assessed, and against which implementation of the Core Paths Plan can be monitored.

## SEA scoping

- 4.8** Following the determination to carry out SEA, the Park Authority sent an SEA Scoping Report to the Consultation Authorities on 25 July 2006. It set out what the potential effects of the Core Paths Plan could be, and proposed a methodology for assessment, including the SEA objectives that would be used for assessment. The Consultation Authorities provided the Cairngorms National Park Authority with their responses on 29 August 2006.

<sup>4</sup> State of the Park Report 2006, Cairngorms National Park (CNPA 2006).

## Developing environmental objectives and criteria

**4.9** The SEA scoping report set out an environmental baseline together with SEA objectives and criteria for assessment of the Draft Core Paths Plan. These were modified following receipt of the Consultation Authorities' comments on the Scoping Report and are described in Section 6 (see page 35) of this Environmental Report. The objectives and criteria were further refined during the assessment.

## Assessing the Draft Core Paths Plan

**4.10** The strategic context for the Draft Core Paths Plan and in particular the strategic objectives for it, are provided by the Cairngorms National Park Plan and Outdoor Access Strategy which have also been subject to SEA. An aim and objectives have been identified for the Draft Core Paths Plan to assist in the identification of a network of core paths. The aim and objectives have evolved through public engagement but have also been influenced and guided by the four aims of the Park as interpreted by the Park Plan<sup>5</sup> and the Outdoor Access Strategy<sup>6</sup>.

**4.11** The aim and objectives along with public consultation have been used to identify core paths on an area by area basis based on the Action Areas identified within the Outdoor Access Strategy<sup>7</sup>. In order to predict the likely environmental effects of the Draft Core Paths Plan, the aim and objectives and the proposed area networks will be evaluated against the SEA objectives. The aim and objectives and the Area Networks are assessed against each of the SEA objectives and given a score and reasoning for that score. In order to make the scoring simple to understand and to analyse, a system of five categories of effect is used for the assessment. These run from strongly positive effects through to strongly negative effects and are shown in figure 4.2 below with symbol codes.

<b>Figure 4.2 – Environmental effect scoring</b>	
<b>Symbol</b>	<b>Description of effect</b>
++	strongly positive effect
+	positive effect
=	neutral or no effect
-	negative effect
--	strongly negative effect
?	uncertain effect/effect cannot be predicted
/	not applicable

<sup>5</sup> Cairngorms National Park Plan 2007, (CNPA 2007).

<sup>6</sup> Enjoying the Cairngorms: Cairngorms National Park Outdoor Access Strategy 2007-2012, (CNPA 2007).

<sup>7</sup> To note, the original Scoping Report proposed assessment of each network on the basis of Community Council areas but this was changed to Action Areas to align the assessment better with the Outdoor Access Strategy.

4.12 The nature and scale of the effects identified for the aim and objectives and each of the Area Networks are recorded in detail in assessment sheets like the one in Figure 4.3 below. This sheet shows the score given for each SEA objective and the reasoning for that score.

<b>Figure 4.3 – Example of SEA Assessment Sheet</b>		
<b>Aim and Objectives/ Area Network</b>	The aim and objectives or area network name.	
<b>Purpose of the Aim and Objectives/Area Network</b>	What the aim and objectives or area network are supposed to achieve and how.	
<b>Identify Aim and Objectives/Area Network Options, including consideration of alternatives where relevant</b>	Detail of what options were considered in developing the aim and objectives or area network, what alternatives (if any were possible) were considered and decisions taken so far.	
<b>Prediction of Direct and Indirect Effects:</b> Detailed assessment of the aim and objectives or area network against each SEA objective and reason behind predictions.		
<b>SEA Objectives</b>	<b>Score</b>	<b>Reasoning for Score</b>
1	eg ++	
2		
etc		
<b>Summary of Aim and Objectives or Area Network Effects</b>	A brief summary of the effects of the aim and objectives or area network based on the detailed assessment.	
<b>Options for Mitigation or Modification</b>	Amendments to strengthen the positive effects or mitigate the negative effects of the aim and objectives or area network.	

4.13 The scores given for each area network for each of the SEA objectives are then compiled into a 'matrix' of scores. The matrix is then used to summarise the overall effects. It can also be used to help identify trends in the effects and to help identify cumulative effects. An example of the assessment matrix is shown in figure 4.4 on the following page.

Figure 4.4 – SEA Area Network Assessment Matrix								
Draft Core Paths Plan Area Network	SEA Objectives							
	1	2	3	4	5	6	7	8, 9, 10 etc...
Central Cairngorms								
Eastern Cairngorms								
Upper Deeside								
etc								
Possible Cumulative Effects								
The possible cumulative effects are calculated on the basis of 2 points for each ++, 1 point for each + score, 0 points for each = or ? or /, less 1 point for each – and less 2 points for each - -								

## The Environmental Report

**4.14** This Environmental Report provides a summary of the SEA process to accompany the Consultative Draft Core Paths Plan, and provides the information required of an Environmental Report as set out in Schedule 3 of the Environmental Assessment (Scotland) Act 2005.

## Modifying the Core Paths Plan and revising the Environmental Report

**4.15** Both the Draft Core Paths Plan and the Environmental Report are subject to consultation. The SEA and Draft Core Paths Plan may change as a result of comments on the Environmental Report or Draft Core Paths Plan. An SEA consultation report will be prepared by the Cairngorms National Park Authority to collate comments on the SEA. A Draft Core Paths Plan consultation report will also collate comments on the Draft Core Paths Plan.

**4.16** The adopted Core Paths Plan will be accompanied by a revised Environmental Report that takes into account comments on this Report and any changes to the Core Paths Plan.

## Finalising monitoring proposals

**4.17** Proposals for monitoring the significant environmental effects will be finalised once informed by the responses to the Draft Core Paths Plan and the Environmental Report.

## Statement of compliance and environmental considerations

- 4.18** A formal stage of the SEA process required by the Directive is a statement of how environmental considerations have been integrated in the Plan; how the environmental report, consultation responses and public opinions have been taken into account; and the reasons for developing the Core Paths Plan as finalised, in light of other reasonable options considered. This statement will be prepared at the time of finalisation of the Core Paths Plan.

## Monitoring significant environmental effects of the Plan to inform review

- 4.19** This stage of the SEA process will be carried out as part of the ongoing monitoring and review of the Core Paths Plan. It is anticipated that monitoring of the significant environmental effects of the Plan will be supplemented by more strategic monitoring of the state of the Park against health indicators (many linked to the state of the environment) that are identified through the Cairngorms National Park Plan process.

## Consultation in the SEA process

- 4.20** This Environmental Report is subject to consultation with the Draft Core Paths Plan. It is hoped that the Consultation Authorities and public will provide comments on the likely significant environmental effects of the Draft Core Paths Plan as well as on the Environmental Report itself.
- 4.21** The SEA process has involved two formal stages of consultation so far. The Consultation Authorities have been asked firstly for screening opinions and secondly for scoping opinions.

## Difficulties encountered in the SEA process

- 4.22** The SEA process is intended to improve the plan-making process and to provide the public as well as the plan-makers with clear information about likely environmental effects of the plan. At this early stage of the plan-making process, a number of factors have created difficulties or uncertainties that have affected both the consultative Draft Core Paths Plan and the SEA.

## Information gathering and availability

- 4.23** Both the Draft Core Paths Plan and SEA require information that is as accurate and up to date as possible. The State of the Park Report, compiled to assist the development of the Park Plan, has gathered together a wide range of current information on the environmental resources of the Park, but also identifies limitations to this information.

- 4.24** The new geography of the Park boundary means that data sets cannot be interrogated or analysed at the Park level, because they have been collated for different boundaries. For example, a significant amount of data is collated at the local authority level, which therefore requires extraction from four different sources, which do not match the Park boundary. This can be compounded by the fact that data is often held in different formats. This is an issue that will be addressed over time as the Park Authority identifies research priorities and carries out monitoring that will give an increasing knowledge base.
- 4.25** There is a lack of baseline information on levels of use of the Park by different recreational groups at a Park-wide level and also the levels of demand for different recreational uses.

### Difficulties encountered in the assessment

- 4.26** The SEA objectives for the Draft Core Paths Plan are the same as those for the SEAs carried out for both the Park Plan, Local Plan and Outdoor Access Strategy. In identifying SEA objectives and criteria, there was difficulty in identifying the appropriate aspects of human health and population to consider in assessment. Schedule 3 of the Act<sup>8</sup> identifies both of these topics as suitable for inclusion. However, it proved difficult to separate the environmental effects of these two topics from the socio-economic effects that might be considered in a broader and separate sustainability appraisal.
- 4.27** These topics have been combined into one SEA objective 11 'to maintain a sustainable and healthy population'. The criteria used for assessment relate to effects on human health and wellbeing, which are considered to include access to key services. The criteria used for this Environmental Report are:
- Ensure non-car access to services for communities;
  - Ensure access to recreation opportunities;
  - Encourage communities and visitors to be more active.

### Natura Sites

- 4.28** The Draft Core Paths Plan is subject to the requirements of Article 6 of the Habitats Directive. This means that the Park Authority will not be able to adopt the Plan if an appropriate assessment has not been carried out in respect of the provisions of the Plan in line with Articles 6.3 and 6.4 of the Habitats Directive. SNH have provided advice to the CNPA and an Assessment of the Draft Core Paths Plan has been done. The Appropriate Assessment is integral to the SEA process and has informed the development of the Draft Core Paths Plan.

<sup>8</sup> Environmental Assessment (Scotland) Act 2005.